

November 18, 2013

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20544

**RE: Request of Krush Communications, LLC and Agregato (USA) Inc.  
for Special Temporary Authority to Permit Krush  
Communications, LLC to Continue Operating Pending the  
Approval of a Domestic and International Transfer of Control  
Application; WC Docket No. 13-272**

Dear Ms. Dortch:

Krush Communications, LLC ("Krush") and Agregato (USA) Inc. ("Agregato USA") (collectively the "Applicants"), through undersigned counsel and pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request Special Temporary Authority ("STA") to allow Krush to continue to provide service to customers pending Commission approval of the parties' Joint Application for consent to the assignment of all of the assets of Krush to Agregato USA that are related to Krush's business as a provider of prepaid nationwide long distance services. Because Krush is already providing services to domestic customers, the Applicants respectfully request that the Commission grant this STA request as soon as possible.

As discussed in the Application, Krush is a holder of domestic 214 "blanket" authorization and international 214 authorization.<sup>1</sup> Agregato USA is a recently formed Delaware corporation that intends to provide domestic and international long distance telecommunications services on a prepaid basis. Agregato USA is not registered to provide interstate telecommunications. Agregato USA is a wholly-owned subsidiary of Agregato Global Limited ("Agregato Global"). Agregato Global is owned by AGMO Holdings Pty Limited ("AGMO Holdings") and M2 Telecommunications Group Limited ("M2 Telecommunications").

On September 1, 2013, Agregato USA acquired all of the assets of Krush, including Krush's licenses, authorizations, customer accounts and receivables, customer and vendor contracts and

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<sup>1</sup> On November 29, 2007, Krush received an International Section 214 authorization for authority to provide global or limited global resale service. File No. ITC-214-20071106-00455. Applicants are filing with the International Bureau an application to assign/transfer control of the International 214 authorization.

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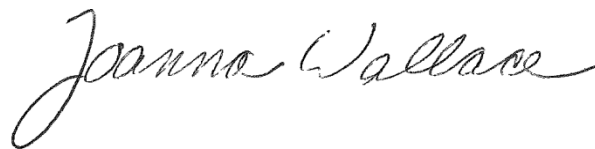
agreements, equipment, and intellectual property. Applicants' failure to obtain Commission approval for the transfer of control was inadvertent. Applicants were not aware of their obligation under the Communications Act and the Commission's rules to obtain approval for the proposed transaction until consulting with Regulatory Counsel, and very much regret any inconvenience this filing may cause the Commission or its staff.

Grant of this STA request will serve the public interest. It will allow Krush to provide uninterrupted telecommunications services during the pendency of the assignment application before the FCC, thereby avoiding the loss of vital communications services by its customers. Further, as described more fully in the assignment application, allowing Krush to continue operations until such time as the application is approved will promote competition in the domestic and international communications services marketplace. Agregato USA will be able to provide Krush's customers with additional and advanced telecommunications services that will enhance the services they already receive. Finally, grant of the instant request will allow Applicants to come into compliance, and begin the formal wind-down process for Krush, thereby reducing the administrative burden on the Commission.

The Applicants acknowledge that grant of this STA request will not prejudice any action the Commission might take on the Joint Application, and the STA may be revoked by the Commission on its own motion and without a hearing. Applicants further acknowledge that grant of this STA request and the Joint Application will not preclude enforcement action.

Please contact the undersigned at (703) 714-1321 if you have any questions or require additional information.

Respectfully submitted,

A handwritten signature in black ink that reads "Joanna Wallace". The signature is fluid and cursive, with the first name "Joanna" being larger and more prominent than the last name "Wallace".

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